

# Ex. 'A'

Declaration of  
Lillian Jo Sondgeroth Donohue

CHRISTOPHER P. BURKE, ESQ.  
Nevada Bar No.: 004093  
atty@cburke.lvcoxmail.com  
218 S. Maryland Pkwy.  
Las Vegas, Nevada 89101  
(702) 385-7987  
Attorney for Debtor

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEVADA**

In Re:	Case No.: 22-11027-ABL
LILLIAN JO SONDGEROTH DONOHUE,	Chapter 13
Debtor.	Date:
	Time:

**PURSUANT TO 28 U.S.C. §1746 LILLIAN JO SONDGEROTH DONOHUE  
DECLARES THE FOLLOWING:**

I, Lillian Jo Sondgeroth Donohue, declare under penalty of perjury that the foregoing is true and correct:

1. That I am the above-mentioned Debtor in this chapter 13 bankruptcy case.
2. That on March 24, 2022 I filed a chapter 13 bankruptcy case.
3. That I am attempting to sell 2240 East Calvada Blvd., Pahrump, Nevada 89048 ("2240 East Calvada Blvd.") for \$550,000 (Ex. 'A' Purchase Agreement).
4. That I am planning on paying approximately \$32,000 into my plan to pay off all claims from the proceeds of sale 2240 East Calvada Blvd.<sup>1</sup>
5. That I am disputing how much is owed on my first mortgage to The Wardlow Survivor's Trust Dated December 27, 2012, through adversary 22-1106 (Dkt.#41, p.15).

---

1. The IRS filed a proof of claim on March 30, 2022 (Claim No. 1-1). The IRS's claim was estimated for \$16,753.68 as a priority and \$9,546.33 as a general unsecured, for a total of \$26,300.01, based upon a failure to file tax returns. However, Donohue filed a declaration on April 15, 2022, that she did not earn enough to file a return for 2018 to 2021 (Dkt.#19). That if Donohue cannot get the IRS to amend its claim, she will be filing an objection to zero it out. Otherwise, there is less than \$6,000 in other unsecured debt to pay through her plan.

6. That I am current with my chapter 13 payment to the Trustee.
7. That an offer has been made to purchase 2240 East Calvada Blvd., that is an all-cash "as-is" deal.
8. That the sale was scheduled to close on July 13, 2022 and we only extended the date to August 8, 2022, out of an abundance of caution, because of the sale having to go through the Bankruptcy Court, but all parties would like the deal to close sooner, by the end of June 2022 or early July 2022.
9. That this is a cash as-is purchase and the buyers are not wanting to wait for a long drawn out court process, that if it not heard on Shortened Time, I could lose this sale.
10. That I want to use part of the sale proceeds to pay off my chapter 13 plan in full, except for the Wardlow Trust disputed claim, pending the adversary proceeding results.
11. That due to the circumstances it is necessary to hear this Motion on Shortened time.

***I declare under penalty of perjury that the foregoing is true and correct.***

Dated this 14<sup>th</sup> day of June, 2022.

  
Lillian Jo Sendgeroth/Donohue